

Jan 04, 2022

s/ JDH

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Brandon Benitez, and
Francisco Martinez JimenezCase No. **22-M-302 (WEC)***Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 3, 2022 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:*Code Section**Offense Description*Title 21, United States Code,
Sections 841(a)(1), (b)(1)(B) and
846

Possession with Intent to Distribute a Controlled Substance

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.COLEMAN
WILLIAMSDigitally signed by COLEMAN
WILLIAMS
Date: 2022.01.04 14:03:46 -06'00'*Complainant's signature*

DEA SA Coleman Williams

*Printed name and title*Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1Date: 01/04/2022City and state: Milwaukee, Wisconsin*Judge's signature*

Hon. William E. Callahan, Jr.

Printed name and title

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Coleman Williams, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Drug Enforcement Administration (“DEA”). I have been so employed since June 2020. Prior to my employment with DEA, I was employed as a Special Agent with the United States Secret Service for approximately 2 years and ten months.

2. As part of my duties as a DEA Special Agent, I investigate criminal violations relating to narcotics trafficking and money laundering offenses, including criminal violations of the Federal Controlled Substance laws, including, but not limited to Title 18, United States Code, Sections 1956, and 1957, and Title 21, United States Code, Sections 841, 843, 846, 848, 952 and 963. I have been involved in electronic surveillance methods, the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage, and importation of controlled substances.

3. I have received training in the area of narcotics investigations, money laundering, financial investigations, and various methods which drug dealers use in an effort to conceal and launder the proceeds of their illicit drug trafficking enterprises. I have participated in investigations involving violations of narcotics laws.

4. This affidavit is based upon my personal knowledge and upon information reported to me by other federal and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. Throughout this affidavit, reference will be made to case agents. Case agents are those federal, state, and local law enforcement officers who have directly participated in this investigation, and with whom your affiant has had regular contact regarding this investigation.

5. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered by law to conduct investigations of and to make arrests for federal felony offenses.

6. Because this affidavit is submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only facts that I believe are sufficient to establish probable cause.

7. I am submitting this affidavit in support of a Federal Criminal Complaint for Brandon BENITEZ (DOB: XX/XX/1997), and Francisco Martinez JIMENEZ (DOB: XX/XX/1993) in the State and Eastern District of Wisconsin. As will be shown below, there is probable cause to believe BENITEZ and JIMENEZ committed the crimes of possession with intent to distribute of a controlled substance, in violation of Title 21, United States Code, Sections 841 (a)(1), 841(b)(1)(B).

PROBABLE CAUSE

8. On January 3, 2022, Milwaukee Metro Drug Enforcement Group (MMDEG) and DEA investigators utilized a confidential source (hereafter referred to as "CS") who placed a call to order three kilograms of cocaine to an unknown source from Mexico. The CS was searched resulting in negative results of contraband. Surveillance was set up at 1631 S. 12th Street, the residence of Brandon BENITEZ. Shortly after the call was made, DEA investigators spotted a dark colored Jeep arrive at BENITEZ's residence driven by Francisco Martinez JIMENEZ and pulled into the alley behind the residence. The vehicle departed on S. 12th Street from the alley with BENITEZ being in the front passenger seat of the vehicle. DEA investigators followed the vehicle to the area of S. 4th Street and Warnimont Ave. where they met the CS. BENITEZ departed the black jeep and got into the front passenger door of the vehicle of the CS. BENITEZ was met

by law enforcement and was arrested having three kilograms of cocaine in his possession. JIMENEZ fled the scene in his vehicle but was caught and arrested in the area of S. Kinnickinnic Ave. and E. Oklahoma by the Milwaukee Police Department. BENITEZ and JIMENEZ were taken to the Drug Enforcement Administration Milwaukee District Office for questioning. Following questioning JIMENEZ admitted his role and involvement in the delivery of the three kilograms of cocaine.

CONCLUSION

9. Based on the above information, I submit that there is probable cause to believe that Brandon BENITEZ (DOB: XX/XX/1997), and Francisco Martinez JIMENEZ (DOB: XX/XX/1993), possessed with intent to distribute and distributed controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).